



## **Records and Information Management (PR677): Revised Operational Procedure**

**To:** Governance and Policy Committee

**Date:** 10 February, 2021

**Report No.:** 02-21-4023

### **Strategic Directions**

- Transform Student Learning
- Create a Culture for Student and Staff Well-Being
- Provide Equity of Access to Learning Opportunities for All Students

### **Recommendation**

It is recommended that the Records and Information Management Procedure, as presented in this report, be received for information.

### **Context**

On November 10, 2020, Executive Council approved revisions to the Recorded Information Management Procedure, which is now referred to as the Records and Information Management Procedure (PR677). The Procedure has been revised to reflect current best practices, legislative requirements, and establish roles and responsibilities for all staff in managing records and information as regular business practice. In addition, a new Records Retention Schedule (RSS) was implemented to replace the former Records Management Classification System.

The revised Records and Information Management Procedure (PR677) was reviewed in February 2021 to ensure alignment with the newly adopted Records and Information Management Policy approved by the Board of Trustees on February 3, 2021.

The revised Procedure outlines and establishes provisions for the management of managing the Board's recorded information assets, including to:

- establish a systematic recordkeeping system that supports the lifecycle of a record;
- provide evidence of business decisions, activities, and transactions of Board operations, including the delivery of its programs and services;
- manage information security and mitigate overall risks;
- preserve corporate memory and organizational history;
- facilitate and sustain day-to-day operations;
- ensure the protection of confidential and sensitive personal information;
- identify vital records for business continuity and disaster preparedness; and,
- support transparency, accountability, and public trust.

Similarly, the Records Retention Schedule (RRS) is designed to ensure that all Board records and information are managed effectively and securely throughout their lifecycle, regardless of their format or media. All TDSB records and information created or received in the course of Board business and operations will be maintained and disposed of using the RRS.

The RRS organizes TDSB records and information into 11 functional categories of the organization and the activities involved in carrying out the functions. The RRS and other records management resources are available on the Board's internal [RIM site](#).

### **Action Plan and Associated Timeline**

Subject to the Governance and Policy Committee's receipt, the revised Records and Information Management Procedure (PR677) will be provided to the Board of Trustees for information.

### **Resource Implications**

N/A

### **Communications Considerations**

The revised Procedure has been posted on the Board's internal website and communicated to the system, including through Direct Line and System Leaders' Bulletin. Resources have been developed for staff outlining the above changes and expectations.

### **Board Policy and Procedure Reference(s)**

- Records and Information Management Policy, New Policy
- Freedom of Information and Protection of Privacy Policy (P094)
- Open Data Policy (P091)

### **Appendices**

- Appendix A: Records and Information Management Procedure (PR677) – revised clean
- Appendix B: Records and Information Management Procedure (PR677) – past version

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# Toronto District School Board

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Operational Procedure PR677

Title: **RECORDS AND INFORMATION MANAGEMENT**

Adopted: September 1, 2006

Effectuated: September 1, 2006

Revised: **November 10, 2020**

Reviewed: September 2007, November 10, 2020

Authorization: Executive Council

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## 1. RATIONALE

The Records and Information Management Procedure (the “Procedure”) supports implementation of the Records and Information Management Policy (P0XX) and the Toronto District School Board’s commitment to the effective, efficient and secure management of recorded information, regardless of format or media.

The Procedure ensures compliance with the *Education Act*, *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA), and *Personal Health Information Protection Act* (PHIPA), and follows industry best practices in the provision of records and information management.

## 2. OBJECTIVE

To outline and establish provisions for the management of managing the Board’s recorded information assets, including to:

- establish a systematic recordkeeping system that supports the lifecycle of a record;
- provide evidence of business decisions, activities, and transactions of Board operations, including the delivery of its programs and services;
- manage information security and mitigate overall risks;
- preserve corporate memory and organizational history;
- facilitate and sustain day-to-day operations;
- ensure the protection of confidential and sensitive personal information;
- identify vital records for business continuity and disaster preparedness; and,
- support transparency, accountability, and public trust.

### 3. DEFINITIONS

*Active Records* means records required for day-to-day business relating to the administration or function of the organization. Active records are referred to regularly and are easily accessible.

*Board* is the Toronto District School Board, which is also referred to as “TDSB”.

*Business Records or Official Records* means any record of information created, collected and/or received during regular Board business that provides evidence of business decisions, actions, and transactions, including the delivery of programs and services.

*Data* is facts, figures and statistics objectively measured according to a standard or scale, such as frequency, volumes or occurrences and forms the basis of information.

*Electronic Records* means records that are captured, generated with and/or used by information technology devices.

*Electronic Recordkeeping Systems* means all electronic platforms and applications endorsed by the Board and used to create, capture, manage and store information including electronic document and records management systems (EDRMS), email, intranet sites, social media, databases, instant messaging, shared drives, clouds, and business information systems.

*Freedom of Information (FOI) Request* is a request under MFIPPA for access to information that is in the custody or control of the Board. Refer to the Freedom of Information and Protection of Privacy Policy (P094).

*Health Information Custodian or “Custodian”*, in accordance with the Personal Health Information Protection Act (PHIPA), is the Toronto District School Board for records related to personal health information.

*Inactive Records* means records that are no longer required in the day-to-day operations of an organization but must be retained for administrative, historical, fiscal, audit, or legal purposes.

*Information* is meaning and value derived through the analysis and interpretation of data.

*Legal Hold* is a process that an organization uses to preserve all forms of relevant and potentially relevant information when litigation, a government investigation, investigation, audit, FOI request, or other legal issue or dispute is reasonably anticipated or is underway. During legal hold, applicable retention periods under the TDSB’s records retention schedule are suspended and all available (including official and transitory) records must be preserved.

*Metadata* is a set of data that describes other data.

*Municipal Freedom of Information and Protection of Privacy Act (MFIPPA)* establishes legal obligations on how public organizations may collect, use, and disclose personal information. MFIPPA also establishes a right of access that enables individuals to request their own personal information and have it corrected.

*Office of Primary Responsibility (OPR)* is the business unit or department that is primarily responsible for the creation and maintenance of a particular series of records. The RRS names the OPR for each series of records. In some cases, these are very specific; in other cases, the OPR is generic. For example, all units hold program planning files, so all units are designated as the OPR for such files.

*Official Records* or *Business Records* means any record of information created, collected and/or received in the course of regular Board business that provides evidence of business decisions, actions, and transactions, including the delivery of programs and services.

*Personal Information* is recorded information about an identifiable individual. As defined by *MFIPPA* this may include, but is not limited to:

- Information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual,
- Information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,
- Any identifying number, symbol or other particular assigned to the individual,
- The address, telephone number, fingerprints or blood type of the individual,
- The personal opinions or views of the individual except if they relate to another individual,
- Correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence,
- The views or opinions of another individual about the individual, and
- The individual's name if it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual.

*Personal Health Information Protection Act (PHIPA)* establishes rules for the collection, use and disclosure of personal health information. It regulates health information custodians ("custodians") operating within the province of Ontario and to individuals and organizations that receive personal health information from health information custodians.

*Record or Recorded Information* means any record of information, however recorded, whether in printed form, on film, by electronic means or otherwise, made or received and retained by an organization in pursuance of legal obligations or in the transaction of business.

Examples include:

- reports, presentations, briefing notes; correspondence such as e-mails; letters, memos; books, pamphlets, plans, maps, drawings, diagrams, graphics; hand-written notes; calendars, text (SMS and/or MMS) messages, and instant messages (IM); voice messages; and video recordings.

*Record Hold*, also referred to as *Legal Hold*, is an order preventing the destruction or disposition of information required for any actual or anticipated *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA) requests, potential or pending litigation or criminal investigations, audits or proceedings before a court or tribunal.

*Records and Information Management (RIM)* is the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records throughout its lifecycle including the processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records.

*Records Retention Schedule (RRS)* is a comprehensive list of records series titles, indicating for each series (1) the length of time each document or record will be retained as an active record, (2) the reason (legal, operational, fiscal, historical) for its retention, and (3) the final disposition (archival or destruction) of the record.

TDSB is the Toronto District School Board, which is also referred to as “Board.”

*Transitory Records* are records of short-term value that can be destroyed immediately or after meeting its transitory need. Examples include a working document used in the preparation of a final document such as reports, policies or procedures or routine emails to schedule or confirm meetings or events.

*Vital Records* means a record containing information that is (1) essential to the operations and/or survival of the organization, (2) necessary to recreate the organization’s legal and financial position, and (3) necessary to preserve its claims and rights and those of its stakeholders.

#### **4. RESPONSIBILITY**

Associate Director, Business Operations and Service Excellence.

## **5. APPLICATION AND SCOPE**

This Procedure applies to all Board staff, Trustees, and service providers (including contractors, consultants) working on behalf of the Board.

This Procedure applies to all recorded information created, captured, collected or received in the normal course of Board business operations, whether held in digital (electronic) or hardcopy format.

## **6. PROCEDURE**

### **6.1. General**

- 6.1.1 Recorded information will be created and collected to support the delivery of programs and services, and regular Board business operations. This recorded information will be captured in TDSB-approved repositories and systems.
- 6.1.2 Recorded information will be organized and described in a meaningful way that is complete, accurate, current, relevant, and understandable.
- 6.1.3 Recorded information will be used, reused, shared, and disseminated where appropriate, respecting legislative and policy restrictions.
- 6.1.4 Recorded information will be safeguarded and protected against unauthorized access, disclosure, loss and damage, while supporting access and retrieval by those required to perform job duties.
- 6.1.5 Recorded information will be retained and disposed of in accordance with the TDSB's Records Retention Schedule, ensuring those of enduring business and historical value are properly preserved.

## **6.2. ROLES AND RESPONSIBILITIES**

### **6.2.1. Senior Leadership Team**

- The Director of Education, Associate Directors, Executive Superintendents and Executive Officers are assigned the highest level of responsibility for ensuring a successful records management program.
- In order to manage information optimally and best serve the interests of the Board, local schools and wider community, senior leadership team will be responsible for the establishment, implementation and maintenance of a records management program, which includes but is not limited to the allocation of resources and ensuring overall compliance with records management.

6.2.2. The TDSB's Records & Information Management (RIM) unit has the primary responsibility for developing, implementing and maintaining a records and information management program.

### **6.2.3. Superintendents, Principals, and Managers are responsible for:**

- Ensuring RIM requirements are integrated into the planning, development, implementation, evaluation, and reporting of services and programs.
- Managing records and information in compliance with the Board's RIM Policy, Records Retention Schedule (RRS), and other relevant TDSB policies and applicable legislation.
- Creating and capturing recorded information that documents their area, department or school's business operations, activities, transactions and decisions to serve as evidence in pursuance of business and legal obligations.
- Communicating, implementing, and supporting compliance with the Records and Information Management (RIM) Program, including applicable policy, procedures, and the Records Retention Schedule (RRS) established by the Board;
- Ensuring staff are aware of and understand their RIM responsibilities, including their obligations to create and maintain records as an integral part of their work.

- Establishing and maintaining a file plan using the Board's Records Retention Schedule (RRS), and related guidelines, for the storage of recorded information.
- Ensuring that appropriate access privileges and security controls are in place to protect confidential and personal recorded information.
- Monitoring to ensure compliance within their area, department or school.
- Ensuring that the legislative requirements and corporate policies and practices related to access, privacy, security, and information management continue to apply when working from home

6.2.4. Staff are responsible for:

- Compliance with the Board's RIM Program, including policy, procedures, records retention schedule (RRS), and practices.
- Creating and managing recorded information in such a manner that provides clear, accurate, and complete evidence of their decisions, transactions, and activities, regardless of the communication methods.
- Creating accurate records and information that document their assigned work duties.
- Managing recorded information in accordance with applicable Board policies, procedures, record retention schedules, and legislative requirements.
- Ensuring recorded information are retained, destroyed or preserved in accordance with the TDSB's Records Retention Schedule (RRS), and procedures related to formal requests for records (e.g. legal hold, FOI request, audit, etc.).
- Ensuring they do not remove personal information from the office (electronic and/or hardcopy) without prior approval
- Participating in RIM training and organized record clean-up activities.

### **6.3. RECORDS RETENTION SCHEDULE (RRS)**

- 6.3.1. The Records Retention Schedule (RRS) is the official schedule for the TDSB and will establish retention and disposition authority of Board recorded information based on enduring business value.
- 6.3.2. The RRS will ensure all Board recorded information is adequately identified, classified, scheduled, retained, preserved and properly disposed of in accordance with legislative and policy requirements.
- 6.3.3. The process for determining retention periods for recorded information will be based on appraisal and scheduled according to operational, legal, fiscal, and historical value, and, in accordance with legislative requirements and accountabilities.
- 6.3.4. All recorded information must be identified and scheduled in accordance with the RRS and will not be destroyed or removed from the custody or control of the Board, except as authorized in the schedule.
- 6.3.5. The RRS will be structured using a function-based classification system that organizes all recorded information by the key business functions of the Board and the activities involved to carry out the function.

#### **6.3.6. Functions**

The RRS is organized into 11 main functional areas of the Board:

- Administration (ADM)
- External Relations and Communications (EXT)
- Facilities and Property Management (FPM)
- Financial Management (FIN)
- Governance (GOV)
- Human Resources Management (HRM)
- Information Technology and Management (ITM)
- Legal Affairs (LEG)
- Research and Planning (RPL)
- Programs and Curriculum (PRO)
- Students (STU)

**(a) Administration (ADM)**

Records relating to general administrative matters such as meetings and committees not related to TDSB governance activities, office administration, ministry reports, and strategic planning. Records may include internal meeting and committees' decisions and agendas, and internal administrative support or services.

**(b) External Relations and Communications (EXT)**

This function promotes and manages relationships with the public, parents, and community; provides strategic communications support, design, and multimedia, including social media, and marketing across the TDSB. Additionally, this function provides development and support of web services to the Board's public, intranet, and school websites. Also included is support in dealing with the media, including issues that may arise; media releases, official statements, broad/webcasts, graphic designs, photography, videography, e-learning, special events, crisis management, special and high-profile visits.

**(c) Facilities and Property Management (FPM)**

This function pertains to the Board's financial, accounting, payroll and compensation services. Records relating to budgets, accounting (payables and receivables), purchasing, transportation, fundraising, grants, audit and risk management, insurance, distribution centre, capital assets; payroll, benefits, and compensation. Records also include personal expense payments, ONSIS reporting; equipment and furnishings, incident reporting.

**(d) Financial Management (FIN)**

This function pertains to the Board's financial, accounting, payroll and compensation services. Records relating to budgets, accounting (payables and receivables), purchasing, transportation, fundraising, grants, audit and risk management, insurance, distribution centre, capital assets; payroll, benefits, and compensation. Records also include personal expense payments, ONSIS reporting; equipment and furnishings, incident reporting.

**(e) Governance (GOV)**

This function covers how the TDSB is governed and regulated to ensure efficiency, accountability, and transparency, and to ensure compliance with statutory and regulatory obligations. Records relating to the Board of Trustee committee proceedings, including standing committees and election records. Also includes agendas, minutes, reports, corporate organizational charts, policy review and development, trustee management, ombudsperson, ministry audits, and, parent and community involvement.

**(f) Human Resources Management (HRM)**

This function includes records relating to TDSB employees, employee-relations, and provides various personnel services. Includes personnel records, labour relations, collective bargaining and agreements, employee information (including health information), conditions of work, attendance, overtime, salary rates, disability case management, human rights management, occupational health and safety, training and development, grievances, performance appraisals, and recruitment.

**(g) Information Technology and Management (ITM)**

This function relates to the production, maintenance and/or management of information-related resources and initiatives by the TDSB and external parties, including enterprise information systems and applications, IT infrastructure, corporate records management, libraries, and freedom to information and privacy. Records may include project plans, proposals, needs assessments, business cases, reports, project charters, FOI requests, privacy breach investigations, change requests, system development documentation, and system upgrade schedules.

**(h) Legal Affairs (LEG)**

This function relates to the legal matters of the Board, including contracts and agreements, copyright, trademarks, litigation and legal proceedings, legal advice and opinions; Ontario Human Rights Tribunal (OHRT) cases, and external legal correspondence.

**(i) Programs and Curriculum (PRO)**

This function provides the application and development of curriculum guidelines and educational programs for students, including continuing education, co-operative, extracurricular, adult, and community programs and services. Records may include, but are not limited to design proposals, guidelines, lesson plans, correspondence, and course outlines.

**(j) Research and Planning (RPL)**

The function of undertaking research and planning to support the ongoing operations of the TDSB and its schools. Records may include research surveys, studies, census, projections and reports regarding school boundaries, student demographics, curriculum, student and parent census, municipal planning and development, and statistics.

**(k) Students (STU)**

This function documents the delivery of programs and services to students at the school level, including student records regarding the enrolment, registration, and attendance; the Ontario Student Record (OSR), Office Index Cards (OIC); counselling, placements and assessment records; consent/permission forms; and extra-curricular such as field trips. Also includes student records relating to co-operative education, continuing education, international programs, student exchanges, and special education. Lastly, records include exams and testing; student marks, nutrition, bus transportation; non-monetary scholarships, grants and bursaries.

**6.3.7. The RRS includes the following eight (8) column headings:**

- a) Acronym – is the acronym or function code assigned to identify the functional category.
- b) Record Series Title – is the name of the record series and contains detailed information on the processes, actions, and/or transactions involved in the creation/production of the record series. Each series includes, the types of records included in the series and, where applicable, similar record series to review into the series.
- c) Office of Primary Responsibility (OPR) – is the office of primary responsibility is typically the originating business unit/department/school that created or became in custody of the record and becomes responsible for its lifecycle management. However, general records that are common across the Board will not have a specific OPR due to its common use.
- d) Total Retention – will define the consolidated total length for both active and inactive retention timelines.
- e) Final Disposition – will define the final action to be taken once the total retention period is reached. Final disposition includes archival review (before destruction), permanent, archival review before applying permanent retention, and destroy.
- f) Comments/Legislation – will provides a further explanation about the retention where necessary; for example, when the retention is based on an event, the event is explained for the records series (i.e., the event date is the date the record was created).
- g) Legacy Code – will reference the previous retention classification code that would apply to each record series, where applicable, as reference for employees to assist with determining what new record series applies using the RRS.
- h) Data & Information Classification – defines the sensitivity label classified to the associated records series title. Each record series is assigned one of three security classifications: ***Restricted, Internal or Public.***

6.3.8 The **Total Retention** and **Final Disposition** columns will reference the following codes in the footer of each page of the RRS:

<b>Code</b>	<b>Definition</b>	<b>Characteristics</b>
D/AR	Archival Review (before destruction)	Requires that, upon expiration of the assigned retention period, the record series be reviewed for any ongoing business value or historical significance before destruction is carried out. Records identified and selected during the archival review process are then selected for long-term preservation and archived, while the remaining records are destroyed. If, upon archival review, no records were identified as having enduring business value or historical significance then the entirety of the series should be destroyed.
CY	Current Year	Refers to the current calendar year (or fiscal year) from January 1 <sup>st</sup> to December 31 <sup>st</sup> .
CSY	Current School Year	Refers to the current school year or September 1 <sup>st</sup> to August 31 <sup>st</sup> .
D	Destroy/Delete	Requires that, upon expiration of the assigned retention period, the records are to be destroyed or deleted. Record series with medium or high sensitivity classifications must be destroyed or deleted securely and completely.
S	Superseded	Refers to the replacement of a document once it has been updated or revised. The new document supersedes the previous version. Several types of records series are living documents that continually get revised, updated or replaced.
T	Trigger event (for termination or close of an event or activity)	The trigger event will specify the event that must occur first to <i>trigger</i> the start of the retention period assigned.

### **6.3.9 RRS Change Requests**

- a) The RRS will be reviewed annually by the RIM unit and any proposed change requests for new or to existing record series, will be reviewed by applicable stakeholders for consideration and approval. Any changes to the RRS will be reflected in the following year.
- b) All staff, including business units, departments, and schools, will complete and submit the *RRS Change Request Form* to the TDSB RIM Mailbox: [RIM@tdsb.on.ca](mailto:RIM@tdsb.on.ca). All changes will be reflected in the latest version of the RRS, and an RRS Change Log will be updated to track all changes.

### **6.4. Official Format**

- 6.4.1 When recorded information exists in both electronic and physical format, the office of primary responsibility (OPR) will decide in which format to retain the official record. The decision must be applied consistently for each record series and duplicates destroyed.
- 6.4.2 When an electronic record is the official record, paper copies will be discarded.
- 6.4.3 For access and privacy purposes, there will be only one complete official copy of each record retained:
  - Back-up copies will be prepared only when there is sufficient need for authenticity of the original record, where they are considered Vital Records and to provide ease of access.

### **6.5. Legal Holds**

- 6.5.1 Legal holds will be issued at the discretion of the TDSB's Legal Counsel in special circumstances involving e-discovery, and legal proceedings.
- 6.5.2 All recorded information pertaining to the specific hold will be forwarded to the Legal Services mailbox.
- 6.5.3 Legal holds will be issued and communicated to the system or appropriate stakeholders in circumstances that are subject, but not limited to: Freedom of Information (FOI) requests, internal/external audits, Ministry requests, or investigations.
- 6.5.4 During an active legal hold, normal retention periods for the recorded information, are for the requested recorded information subject to the hold are to be retained legal and record holds, the requested recorded information shall not be destroyed or altered in any way, and their retention suspended indefinitely until the hold is no longer in effect.

**6.6. Organize and Store**

- 6.6.1 Business units, departments, and schools should develop a file plan for organizing and storing their recorded information.
- 6.6.2 Recorded information will be organized, described and maintained to ensure timely access and retrieval.
- 6.6.3 Storage plans for recorded information will establish the short and long-term storage requirements for inactive recorded information, including paper, physical media and digital formats.
- 6.6.4 The TDSB's RIM unit will receive and maintain the destruction certificates, authorization and transmittal documents from business unit heads.
- 6.6.5 The Board's records management administrator will assist, maintain and coordinate inactive recorded information to the TDSB's vendor for records storage. Active recorded information is to be maintained at the site they originated in and shall be managed in accordance with the RRS. Exception to inactive OSRs received by schools to the Central Transcript Office.
- 6.6.6 Inactive Ontario Student Records (OSRs) that are received and purged from schools will be transferred to and stored centrally via the Central Transcript Office (CTO) for long-term preservation in accordance with the Ministry of Education's *Ontario Student Record (OSR) Guideline, 2000*. Refer to the [CTO's site](#) for all OSR-related documentation.
- 6.6.7 Recorded information will be stored securely, ensuring restricted access to recorded information containing sensitive and/or personal information, such as using lockable filing cabinets; practicing a clean desk routine; using privacy screens if monitor is easily exposed to others.
- 6.6.8 Recorded information will be labeled and organized for efficient retrieval and destruction.

**6.7. Disposal**

- 6.7.1 Disposition of recorded information will be done in accordance with the retention and final disposition criteria defined and included in the RRS.
- 6.7.2 Regular review of recorded information for disposal will be completed annually.
- 6.7.3 The destruction of recorded information will be documented using an official records destruction form and authorized by the senior or business manager, department head or principal responsible for their management. All destruction forms will be forwarded to the RIM unit for long-term storage and will be kept by the applicable manager.
- 6.7.4 All transitory records and information will be discarded once their purpose is met and no longer required. This includes working papers, reference information, duplicates, and drafts of documents when they are finalized.
- 6.7.5 Recorded information that includes sensitive confidential, and/or personal information will be destroyed securely. This means, using secured (locked) shredding bins, including emptying computer's electronic recycling bin.
- 6.7.6 Recorded information will be destroyed in such a way that ensures it cannot be reconstructed, read, or duplicated.
- 6.7.7 Recorded information subject to active legal or a record hold will be retained indefinitely until the hold is no longer in effect, regardless of the assigned retention.
- 6.7.8 When an employee departs from the Board, their records and information will be reviewed for disposition and official records will be forwarded to the applicable business manager, supervisor, principal or vice-principal.

**6.8. Access, Security and Control**

- 6.8.1 Access to confidential and sensitive data and information will be restricted to those with a legitimate work-related purpose, authority or on a 'need-to-know' basis for accessing such data and information.
- 6.8.2 Physical recorded information (e.g. paper) containing confidential and or sensitive information will be stored in secure locations (i.e. lockable cabinets, locked records storage areas, and/or off-site at Board-endorsed third-party record centres).
- 6.8.3 Only store confidential and sensitive recorded information in Board-approved and formally established information systems, repositories, cloud solutions or secured network drives.
- 6.8.4 Confidential and sensitive recorded information will not be stored on an individual's computer hard drive (e.g. (C :) Drive), external hard drives, or unencrypted USB drives.

- 6.8.5 Staff will securely and permanently destroy data and information in accordance with the RRS, and applicable policies and procedures.
- 6.8.6 Staff will not download or transfer confidential, sensitive and/or internal Board recorded information to unapproved storage devices.
- 6.8.7 Contractual arrangements will include provisions for the protection and appropriate use of Records and Information Management to mitigate risks.
- 6.8.8 Records and Information Management will be managed to support business continuity and recovery in the event of disaster.

## **6.9 Remote Working**

- 6.9.1 TDSB policies and procedures, including compliance with legislative and accountability requirements, related to the management, security, access, and privacy of TDSB recorded information apply when working remotely or working from home.
- 6.9.2 Recorded information containing personal information, or other restricted or sensitive information will not be saved or stored to any personal device (i.e. home computer, tablet, external hard drive). Staff will only use a TDSB-issued and managed device(s) with an encrypted hard drive, accessed via Virtual Private Network (VPN).
- 6.9.3 Final versions of documents or files will be stored in a TDSB shared network drive, cloud repository or system (e.g. shared drives, Google Docs, MS Teams, MS One Drive via Office 365, MS SharePoint). Transitory records such as duplicates, and convenience copies stored on TDSB devices will be deleted regularly or when no longer needed.
- 6.9.4 Hard-copy (paper) records such as hand-written notes concerning your work activities, or preliminary work-in-progress versions of documents that are printed at-home, are confidential records requiring secure storage, handling, and destruction when no longer required.
- 6.9.5 Staff will establish and maintain a clean desk routine when leaving their remote workspace for any length of time and at the end of the day:
  - Secure hard-copy records; do not leave confidential work information unsecured; ensure they are stored in a lockable drawer or file cabinet.
  - Lock your computer or device screen if you do not turn off your computer.

## 7. EVALUATION

This operational procedure will be reviewed and amended, as required. At a minimum, it will be reviewed every four (4) years after the effective date.

## 8. APPENDICES

- TDSB Data & Information Classification (Appendix A)

## 9. REFERENCE DOCUMENTS

The Records Retention Schedule (RRS) via:

- TDSBWeb – [Records and Information Management \(RIM\) site.](#)

Legislation:

- *Canada Evidence Act*
- *Education Act*
- *Electronic Commerce Act*
- *Municipal Freedom of Information and Protection of Privacy Act*
- *Ontario Evidence Act*
- *Personal Health Information Protection Act*

Policies and Procedures:

- Acceptable Use of Information Technology Resources Policy (P088)
- Cyber Risk and Security Procedure (PR725)
- Freedom of Information and Protection of Privacy Policy (P094)
- Open Data Policy (P091)
- Records and Information Management Policy (P0XX)

Other Documents:

- *Ontario Student Record (OSR) Guideline, 2000*
- *TDSB's Records Management Classification System, August 18, 2004*

Appendix A

**Data & Information Classification**

Indicates the sensitivity level of the information within a record series. Each record series is assigned one of three (3) classifications labels: **Public**, **Internal** or **Restricted**. Each classification label is based on the level of risk associated, and the impact it would have on the TDSB, its employees, students, and or partners, should the information be compromised in any way.

The classifications ensure that the appropriate safeguards are in place and applied to protect it from unauthorized disclosure or access. The security classifications are highlighted in the RRS as follows:

<b>Classification</b>	<b>Description</b>
<b>Restricted</b>	This applies to data and information whose unauthorized disclosure could <b>result in serious injury</b> , significant financial impact, or major and irreparable harm to TDSB, its employees and partners.
<b>Internal</b>	This applies to data and information whose unauthorized disclosure <b>could result in injury</b> , breach of confidentiality or cause financial impact to TDSB, including individuals, litigation, penalty for non-compliance, negative publicity, damage to the TDSB brand and reputation.
<b>Public</b>	This applies to data and information whose unauthorized disclosure <b>would not result in injury</b> or cause harm to the TDSB, individuals, or other legitimate stakeholders.

**NOTE:** A record series classified as **Public** does not necessarily mean that the information is part of a routine disclosure or that it is already available to the public.

Public classification can mean that the record series could be requested and released through a Freedom of Information (FOI) Requests, or that if an unauthorized disclosure took place, it would not result in injury or harm to the TDSB or individuals.

# Toronto District School Board

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Operational Procedure PR677

Title: **RECORDED INFORMATION MANAGEMENT**

Adopted: September 1, 2006, **September 2007**

Revised:

Reviewed: December 2012

Authorization: Executive Council

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## 1.0 OBJECTIVE

To provide information concerning the Board's recorded information management system including the records classification system and the records retention schedule

## 2.0 RESPONSIBILITY

Manager, Board Services

## 3.0 DEFINITIONS

In November 1998, a Records Classification System for the Toronto District School Board was approved.

Under the Municipal Freedom of Information and Protection of Privacy Act, the Board is required to ensure access to information under its control or custody, within the provisions of the legislation. Solid recorded information management practices, such as the use of accurate and consistent coding, filing and retrieval practices, assist the Board to meet its obligations to provide access to Information.

## 4.0 PROCEDURES

- 4.1 The Board's Recorded Information Management system is comprised of two parts: the Records Classification System and the Records Retention Schedule.
- 4.2 This system applies to both paper and electronic records and was distributed to all administrative staff in schools and education centres. As many changes have taken place within departments over the last few years this information is being reissued in this procedure format.
- 4.3 In order to assist staff with this process the procedure provides the following:
  - (a) Card outlining whole classification system (677A)
  - (b) Card outlining alphabetical index to the classification system (677B)

- (c) Information on how to a Windows folder called TDSB which includes sub-folders for every classification code (677J)

All records, including documents, **must be saved and/or filed** in accordance with the correct Records Classification Code, and **have the code noted** on the record.

4.4 Supporting Documents (published as forms)

The documents that follow comprise the actual procedure for the Records Classification System. They are accessed as forms on the Policy and Procedures website and may be printed and placed in a binder or referred to on-line, according to individual preference.

<u>Title</u>	<u>Document (Form)</u>	<u>Instructions</u>
DESKTOP REFERENCES		
Records Management Classification System: Quick Reference	<b>677A</b>	It is suggested that this be printed on <b>PINK</b> card stock and used as a handy <b>desktop reference</b> . It is three pages in length provides a quick reference of the classification codes.
Records Management Classification System: Subject Guide	<b>677B</b>	It is suggested that this be printed on <b>GREY</b> card stock and used as a handy <b>desktop reference</b> . It is 11 pages in length and provides a quick cross-reference of how common types of records should be coded.
USE ON-LINE OR PLACE IN BINDER (print on white paper)		
Cover page	<b>677C</b>	1 page in length
Table of Contents	<b>677D</b>	1 page in length
Recorded Information Management Model	<b>677E</b>	9 pages in length This document provides an overview of the Recorded Information Management model, from exactly what constitutes a “record” to examples of record coding.
Frequently Asked Questions	<b>677F</b>	2 pages in length. This document provides a summary of the records that would be includ-

<u>Title</u>	<u>Document (Form)</u>	<u>Instructions</u>
		ed in the eleven primary headings. (The primary headings are the alphabetical designation of the code.)
Summary or Primary Headings	<b>677G</b>	3 pages in length. This document provides a summary of the records that would be included in the eleven primary headings. (The primary headings are the alphabetical designation of the code.)
Scope Notes	<b>677H</b>	60 pages in length. This document is extremely useful in helping you to determine how a file should be coded. For each classification code, examples are given of what should be included and what should not be included.
<b>LABELS FOR HARDCOPY FILES</b>		
File Labels	<b>677I</b>	9 label sheets are required; This is a file that will print a set of file labels in the 2 x 15 format (30 labels per page). Nine label sheets are required.
<b>OTHER INFORMATION</b>		
Instructions for Installing a MSWindows TDSB Folder on Your Computer	<b>677J</b>	5 pages in length. This document provided instructions for downloading a Windows folder called TDSB which includes sub-folders for every classification code
Records Management Retention Guidelines	<b>677K (alpha)</b> <b>677L (by classification code)</b>	25 pages each in length. These documents serve as a base to ensure that records are appropriately retained according to a legal and/or ministry retention schedule. Executive Assistants are responsible for off-site storage of departmental records. (This function is not related to the Board's Museum and Archives.)
Yearly Memo From Administrator	<b>677M</b>	7 pages in length. This memo is distributed at the beginning of every school year providing general information and updates re the Recorded Information Management system.

Contact for additional information:  
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Manager, Board Services

## **5.0 REFERENCE DOCUMENTS**

Operational Procedure

PR676: Freedom of Information and Protection of Privacy